

# HALLMAN & WINGATE

LLC  
ATTORNEYS AT LAW

F. EDWIN HALLMAN, JR.

(404) 588-2525 DIRECT  
(404) 588-2530 MAIN  
(404) 588-2535 FACSIMILE  
[ehallman@hallmanwingate.com](mailto:ehallman@hallmanwingate.com)

166 ANDERSON STREET, S.E.  
SUITE 210  
MARIETTA, GEORGIA 30060  
[www.hallmanwingate.com](http://www.hallmanwingate.com)

July 11, 2013

**VIA FOIA ONLINE ONLY**

FOIA Officer  
United States Environmental  
Protection Agency, Region 2

Re: Commonwealth Oil Refining Co.  
Petroleum Sheen Contamination on  
Guayanilla Bay  
HW File No. 2115/073

Dear Sir or Madam:

Our firm has the pleasure of representing Commonwealth Oil Refining Co. ("CORCO"). It is our understanding that CORCO and other companies are the subject of investigations by the United States Environmental Protection Agency ("EPA") and the United States Coast Guard ("Coast Guard") regarding reported petroleum contamination in Guayanilla Bay.

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, we request to review and obtain copies of any and all documents related to the investigation of the petroleum contamination in Guayanilla Bay.

The term "documents" means any and all materials in both draft and final form in the possession of the EPA, whether generated by the EPA or private parties, including briefs, exhibits, reports, directives, memoranda, staff analyses, studies, correspondence, emails, notes, drafts, charts, financial data, electronic media of any kind, and any recordations or summaries of telephone conversations, meetings, interviews or conferences, including marginal comments.

We request access to and/or copies of the following:

1. All documents regarding the source or sources of petroleum contamination found in Guayanilla Bay;
2. All documents provided by the EPA to the Coast Guard regarding the contamination;

3. All documents provided by the Coast Guard to the EPA regarding the contamination;
4. All documents regarding any sampling conducted by the EPA and/or the Coast Guard, including any forensic testing;
5. All documents with the reference of WA#SER03017; and
6. All documents relating to any investigations of the property owned by Shell and PREPA.

In the event that you determine that some portions of the requested materials are exempt from disclosure, please provide us with copies of all pages of documents from which information has been deleted with the alleged exempted portions deleted. We request a detailed description of any material that is deleted and specification of the statute and/or regulatory basis for your refusal to disclose the deleted material, as well as your reasons for believing that the statutory exemption applies. CORCO stands ready to pay the reasonable copying costs of any and all materials supplied as a result of this request, with the assessment of the cost prior to the generation of copies. Please contact us if the estimated production costs are in excess of \$250.

Pursuant to 5 U.S.C. § 552(a)(6)(A)(1), your reply to this request is due within twenty (20) working days after receipt of this request. Please call me immediately if you have any questions concerning this request.

Sincerely,



F. Edwin Hallman, Jr.

For HALLMAN & WINGATE, LLC

FEHjr:kps

c: Mr. Rolando H. Mendez  
Mr. Roberto Gratacos  
Mr. Eduardo Gonzalez, EPA, San Juan  
Warner Golden, P.E.